

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

TRANSCONTINENTAL GAS PIPE
LINE COMPANY, LLC,

Plaintiff,

No. 1:23-cv-00463

V.

PENNSYLVANIA
ENVIRONMENTAL HEARING
BOARD, et al.,

Defendants.

**UNOPPOSED MOTION OF DEFENDANTS DELAWARE RIVERKEEPER
NETWORK, MAYA K. VAN ROSSUM, THE DELAWARE
RIVERKEEPER, AND CITIZENS FOR PENNSYLVANIA’S FUTURE FOR
PERMISSION TO FILE A BRIEF IN EXCESS OF 5,000 WORDS**

Defendants Delaware Riverkeeper Network, Maya K. van Rossum, the Delaware Riverkeeper, and Citizens for Pennsylvania’s Future (collectively, “EHB Appellants”) hereby submit this Motion for Permission to File a Brief in Excess of 5,000 Words. In support thereof, EHB Appellants aver as follows:

1. EHB Appellants will be filing a brief later today in response to Plaintiff Transcontinental Gas Pipe Line Company, LLC's Emergency Motion for Preliminary Injunction, ECF No. 8.

2. Local Rule 7.8(b) limits the length of briefs to 15 pages or 5,000 words.

3. Plaintiff's brief in support of its Emergency Motion for Preliminary Injunction was 8,226 words in length. *See* ECF No. 10.

4. Due to the length of Plaintiff's brief, as well as the complexity of the legal issues surrounding the merits of Plaintiff's claims, EHB Appellants respectfully request that the Court accept a response brief of up to 8,000 words.

5. Counsel for EHB Appellants has made every effort to address the relevant issues raised in Plaintiff's motion in a full and concise manner.

6. Plaintiff has confirmed that it agrees to the aforementioned enlargement of EHB Appellants' brief.

7. The remaining Defendants have confirmed that they do not oppose the instant motion.

WHEREFORE, EHB Appellants respectfully request that this Court accept a brief of up to 8,000 words in response to Plaintiff's Emergency Motion for preliminary Injunction.

/s/ Kacy C. Manahan
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Dated: April 17, 2023

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CERTIFICATE OF CONCURRENCE

I, Kacy C. Manahan, certify that counsel for Defendants Delaware Riverkeeper Network, May K. van Rossum, the Delaware Riverkeeper, and Citizens for Pennsylvania's Future sought concurrence from all other parties via electronic mail on April 17, 2023. No party opposes the relief requested in the Motion for Permission to File a Brief in Excess of 5,000 Words.

/s/ Kacy C. Manahan

Kacy C. Manahan, Esquire

Dated: April 17, 2023